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United States Courts  
Southern District of Texas  
FILED

*April 09, 2024*

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**CHRISTOPHER WASHINGTON TORAL**

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§

**CRIMINAL NO. 4:24-cr-00183**

**UNDER SEAL**

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

**(Laundering of Monetary Instruments)**

On or about February 9, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**CHRISTOPHER WASHINGTON TORAL,**

with the intent to conceal and disguise the nature, location, source, ownership and control of property he believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer to the defendant to be proceeds of specified unlawful activity, to wit: approximately \$200,000.00 in United States currency represented to the defendant to be proceeds from the manufacturing, importation, sale and distribution of a controlled substance and possession with intent to distribute a controlled substance, offenses in violation of the Controlled Substances Act.

In violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**COUNT TWO**  
**(Laundering of Monetary Instruments)**

From on or about February 28, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant

**CHRISTOPHER WASHINGTON TORAL,**

with the intent to conceal and disguise the nature, location, source, ownership and control of property he believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer to be proceeds of specified unlawful activity, to wit: approximately \$200,000.00 in United States currency represented to the defendant to be proceeds from the manufacturing, importation, sale and distribution of a controlled substance and possession with intent to distribute a controlled substance, offenses in violation of the Controlled Substances Act.

In violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**COUNT THREE**  
**(Laundering of Launder Monetary Instruments)**

From on or about March 3, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**CHRISTOPHER WASHINGTON TORAL,**

with the intent to conceal and disguise the nature, location, source, ownership and control of property he believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer to be proceeds of specified unlawful activity, to wit: approximately \$300,000.00 in United States currency represented to the defendant to be proceeds from the manufacturing, importation, sale and distribution of a controlled substance and possession with intent to distribute a controlled substance, offenses in violation of the Controlled Substances Act.

In violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. § 982(a)(1))**

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendant,

**CHRISTOPHER WASHINGTON TORAL,**

that, upon conviction of any of the offenses charged in Counts One, Two and Three of the Indictment, all property, real and personal, involved in such offenses, or traceable to such property, is subject to forfeiture to the United States.

Property Subject to Forfeiture

The property subject to forfeiture includes, but is not limited to, the following property: \$40,000 in United States Currency.

Money Judgment

Defendant is notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendant is notified that in the event that property subject to forfeiture, as a result of any act or omission of a defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be divided without difficulty,

the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture, pursuant to Title 18, United States Code, Section 982(b).

A TRUE BILL:

**Original Signature on File**  
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FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY

*Carolyn Ferko*  
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CAROLYN FERKO  
Assistant United States Attorney